

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Marelle Deshawn James Dye,

Case No.

Case: 4:25-mj-30246

Judge: Ivy, Curtis

Filed: 04-21-2025

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 19, 2025 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:

There is probable cause to believe that on or about April 19, 2025, in the Eastern District of Michigan, Marelle Dye violated 18 U.S.C. § 922(g)(1)(felon in possession of a firearm).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence and/or by
reliable electronic means.

Date: April 21, 2025

City and state: Flint, MI


Complainant's signature

Sean Thomas, Special Agent, FBI

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Sean Thomas, being duly sworn state the following is true and accurate to the best of my knowledge, information and belief.

1. I make this affidavit from personal knowledge based upon my participation in this investigation, with exception of the matters expressly stated, which are based upon information received from other law enforcement personnel and/or their reports and records. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or facts that exist pertaining to the investigation.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2019. I am currently assigned to the FBI’s Detroit Division – Flint Resident Agency after serving one year with the FBI Boston Division’s Criminal Unit. From August 2020 through November 2020, I participated in Operation Legend at the FBI Chicago Division’s Violent Crime Unit. Prior to my employment with the FBI, I served as a Michigan State Trooper from 2012 until 2019, and was assigned to the Major Crime Unit and FBI Safe Streets Task Force, both in the City of Flint, Michigan. In 2008, I was certified as a police officer for the City of Nashua, New

Hampshire Police Department where I served as a uniform officer until June 2012.

3. I believe that Marelle Deshawn James Dye, DOB: XX/XX/1988, committed the violation of 18 U.S.C. section 922(g)(1), felon in possession of a firearm.

4. On April 19, 2025, at approximately 3:50 a.m., Michigan State Police (MSP), Genesee Township Police, Flint Police Department, and Genesee County Sheriff's Department (GCSD) responded to a Gas Station located in Flint, MI for a report of a shooting.

5. While assessing the incident, Tpr. Sowers observed a black male, later identified as Dye, arguing with a female across the street at a church located in Genesee Township. At the time, Dye was the driver and sole occupant of the black colored Chevrolet Silverado.

6. While on scene at the Gas Station, a female witness, whose identity is known to law enforcement, approached officers and advised that a male (Dye) in a black truck, pointed a pistol at her over an argument. The female witness indicated that the male suspect was wearing a blue jump suit, and that he (Dye), along with the black truck, were located across the street at the Church.

7. After obtaining the information, MSP troopers and assisting law enforcement responded to the parking lot of the Church where Dye was located.

8. Inside the Chevrolet Silverado, a wallet with Dye's Michigan driver's license card was found on the dashboard. Located on the driver's seat was a cellular phone, along with a 9mm caliber Glock 19 bearing serial number AEPS560 that was loaded with approximately (17) ammunition rounds with one (1) round chambered. The Glock 19 was reported as stolen per Law Enforcement Information Network (LEIN) check out of Flint Township.

9. I reviewed the 911 call notes for the reported "person with a gun" incident and confirmed that the female witness called 911, at approximately 3:51 a.m., and advised dispatch that "Mario" was wearing a blue jumpsuit in a black Chevy Silverado and pulled a black handgun on her in the parking lot of the church.

10. I have prior knowledge from unrelated investigations of Dye that his street alias name was/is often referred to as "Mario" and "Reo."

11. I have reviewed criminal history records for Dye and found that he is currently under federal supervised release out of the United States District Court for the Eastern District of Michigan. As such, Dye has the following felony convictions:

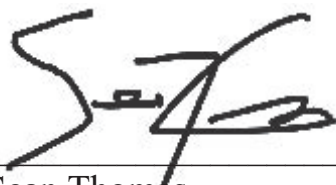
- a. 2014 – Felony firearms
- b. 2018–Distribution of a Controlled Substance; Felon in Possession of a Firearm

These are felony offenses punishable by a term of imprisonment exceeding one (1) year.

12. On April 21, 2025, I spoke with Special Agent Dustin Hurt of the Bureau of Alcohol, Tobacco and Firearms & Explosives (ATF) in his capacity as an interstate nexus authority in the manufacture and movement of firearms and ammunition in interstate and foreign commerce. Special Agent Hurt determined that the Glock, 9mm black semi-automatic pistol, was manufactured outside of the State of Michigan, and is a firearm as defined in Chapter 44, Title 18, United States Code.

13. I, Special Agent Sean Thomas, therefore, have probable cause to believe that Dye violated 18 U.S.C. section 922(g)(1), felon in possession of a firearm.

Dated the 21st day of April, 2025.

A handwritten signature in black ink, appearing to be 'S. Thomas', written over a horizontal line.

Sean Thomas
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 19th day of April, 2025.

A handwritten signature in black ink, appearing to be 'C. Ivy', written over a horizontal line.

Hon. Curtis Ivy, Jr.
United States Magistrate Judge